

REMARKS

In reply to the Office Action of October 30, 2009, Applicants have amended claim 64. No claims have been canceled or added. Accordingly, claims 1-4, 6-15, 17-25, 27-28, 30-31, 33-49, 52, and 54-64 are pending, with claims 1, 13, 17, 52, and 64 in independent form.

Claims 17-19, 27, and 54-57 stand rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Huang et al. (U.S. Patent No. 6,246,111, "Huang"). Independent claim 17 recites a housing for one or more light-emitting components that includes, as part of a leadframe: a mount part with "at least one wire connecting area," and "an opening formed therein and extending completely through the mount part"; and a thermal connecting part "disposed in said opening and fastened into said mount part to form an electrical connection with the at least one external connecting strip." With regard to claim 17, the Action refers in particular to Figure 5 of Huang and alleges that Huang discloses each of the elements of claim 17 (Action at pages 2-3). In particular, the Action states:

Huang et al. discloses in figure 5 a housing for one light emitting component 324 comprising a lead frame including a mount part having at least one wire connecting area; and opening formed therein and extending completely through the mount part; and at least one external electrical connecting strip 302; and a separately manufactured thermal connecting part 310 disposed in said opening and fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip, said thermal connecting part having at least one chip mounting area; wherein the thermal connecting part extends through the opening in the mount part and connects to the mount part at the opening to transfer heat away from the mount part. (Action at page 2.)

The Action also refers to column 3, lines 54-67 and column 4, lines 1-67 as allegedly providing support for its interpretation of Huang. As best Applicants can determine, the Action appears to identify chip 324 in Huang as allegedly corresponding to the "one or more light-emitting components" recited in claim 17, and to heat sink 310 as allegedly corresponding to the "thermal

connecting part” recited in claim 17. With this interpretation in mind, Applicants respectfully disagree with the Action’s reading of Huang with regard to claim 17, for at least the following reasons.

First, chip 324 in Huang does not appear to be a light-emitting component, and therefore Huang’s housing is not a “housing for one or more light-emitting components” as required by claim 17. In the Background section, Huang discusses prior art semiconductor chip packages, and refers to Figures 1 and 2 as exemplary prior art packages. Huang states that prior art packages are “constructed on a lead frame and [have] a die pad 100 surrounded by [] multiple leads 102” (Huang, col. 1, lines 35-37). Chip 104 includes “an active surface 106 and a back surface 108 ... [a]nd a plurality of bonding pads 110 for external connections of the chip 104 [are] disposed on the active surface 106” (Huang, col. 1, lines 37-40). Further, “a molding compound 116 normally encapsulates the whole chip 104, the die pad 100, the bonding wires 114, and the top surface 118a of the lead 102” (Huang, col. 1, lines 44-46). The chip packages disclosed by Huang are intended to be improvements over prior art packages. Specifically, Huang discloses an alternative package in which heat dissipation is allegedly improved by exposing a surface of a heat sink for external connection to a thermal reservoir (see, e.g., Huang, col. 1, lines 50-67).

Huang does not refer to either the chips in prior art packages, or to chip 324, as light-emitting chips. Moreover, both the prior art chips and Huang’s chip 324 are entirely encapsulated by molding compound (see, e.g., Figures 1 and 5 of Huang). Further, both the prior art chips and Huang’s chip 324 include multiple leads to provide external connections to the chip. For example, in Figures 5 and 6, Huang’s chip 324 includes 16 external connections through leads 302. Such an arrangement of external connections is typical of a semiconductor integrated circuit chip that receives incoming electrical signals on some of leads 302, and transmits output electrical signals on other leads 302. Conversely, single light-emitting chips typically include only two external connections to bias the chips appropriately to cause light emission. Applicants believe, therefore, that Huang’s chip packages are not used in connection with light-emitting components, as claim 17 requires, but are instead used in connection with

conventional integrated circuit chips. As a result, Huang's housing is not a "housing for one or more light-emitting components" as required by claim 17.

Second, Huang does not disclose a "mount part" as recited in claim 17. Claim 17 requires that the mount part have "an opening formed therein and extending completely through the mount part." In contrast, Huang's chip packages include "a plurality of leads 302 disposed at the perimeter of the chip 324 and surrounding the chip 324" (Huang, col. 3, lines 61-62). Each of the leads 302 in Huang's chip packages provides an external connection to chip 324, implying that each of leads 302 is a separate element. In other words, each of leads 302 is not connected to any of the other leads 302.

As such, the space circumscribed by the ends of leads 302, in which heat sink 310 is positioned, is not an "opening" in a mount part, as claim 17 requires. Instead, heat sink 310 is merely positioned in a gap that is formed between multiple leads 302. As leads 302 are all separate elements, none of leads 302 has "an opening formed therein and extending completely through" the lead. Where claim 17 recites a single mount part having an opening that extends through the mount part, Huang discloses instead a plurality of separate, disconnected leads, arranged so that chip 324 is positioned in a gap between the leads – that is, adjacent to the ends of multiple leads 302. But none of leads 302 separately includes an "opening" in which chip 324 is positioned, as claim 17 requires. Accordingly, Applicants submit that Huang fails to disclose or suggest the mount part recited in claim 17.

Third, Huang does not disclose a thermal connecting part "fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip," as required by claim 17. As explained above, Applicants believe that Huang does not disclose a mount part at all, and so Huang also therefore does not disclose a thermal connecting part fastened into a mount part. However, to the extent that leads 302 are alleged to form the recited mount part – which Applicants do not concede – heat sink 310 is not fastened to leads 302 "to form an electrical connection" with leads 302. Instead, Huang states that the "heat sink 310 is bonded to the first surface 304a of the lead 302 by an adhesive, preferably an insulative bonding tape 320" (Huang, col. 4, lines 13-15).

As shown in Figure 5, chip 324 is electrically grounded through wire 332a to heat sink 310. Further, bonding pads 328 on the side of chip 324 opposite to heat sink 310 are electrically connected to leads 302 via wires 332. However, there is no electrical connection between heat sink 310 and leads 302. Applicants believe that if heat sink 310 and leads 302 were connected, wire 332a would no longer function as a grounding wire, as it would in effect constitute a direct connection to an external current source through leads 302.

Thus, Huang explicitly discloses that in his chip package there is *no electrical connection* between heat sink 310 and leads 302. Accordingly, Applicants believe that Huang does not disclose or suggest a thermal connecting part “fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip,” as required by claim 17.

For all of the foregoing reasons, Applicants submit that claim 17 is patentable over Huang, and respectfully request reconsideration and withdrawal of the rejection of claim 17 under 35 U.S.C. § 102(e). Claims 18-19, 27, and 54-57 each depend from claim 17, and are therefore patentable over Huang for at least the same reasons. Accordingly, Applicants also respectfully request reconsideration and withdrawal of the rejections of these claims under 35 U.S.C. § 102(e).

Claims 1-4, 6-12, 20-25, 28, 30-31, 33-40, 43-46, 49, 52, 58, and 60-63 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Huang in view of Okazaki (JP 5-102531, “Okazaki”). Applicants respectfully disagree with these rejections for at least the following reasons.

Independent claim 1 covers leadframes for radiation-emitting components that include a mount part with “an opening formed therein and extending completely through the mount part,” and a thermal connecting part “disposed in said opening and fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip,” where the mount part includes “a reflector well surrounding the chip mounting area.” The Action alleges that Huang discloses all of the limitations of claim 1 except for the reflector well, alleges further that Okazaki discloses such a well, and proposes to combine Huang and Okazaki (Action at pages 3-4). Applicants respectfully disagree, for at least the following reasons.

First, as discussed above, Applicants believe that Huang's chip 324 is not a light-emitting chip, but is instead a semiconductor integrated circuit chip. As such, Huang's chip package does not include a "leadframe for a radiation-emitting component," as required by claim 1.

Second, also as discussed above, Huang does not disclose a "mount part" as recited in claim 1. Huang's chip package includes "a plurality of leads 302 disposed at the perimeter of the chip 324 and surrounding the chip 324" (Huang, col. 3, lines 61-62). Each of the leads 302 in Huang's chip package is a separate element. Accordingly, the space in which heat sink 310 is positioned is not an "opening" in a mount part, as claim 1 requires. Instead, the space is merely a gap adjacent to the ends of each of the leads 302. Leads 302 are all separate elements, none of which has "an opening formed therein and extending completely through" the lead. Where claim 1 recites a single mount part having an opening that extends through the mount part, Huang discloses instead a plurality of separate, disconnected leads, arranged so that chip 324 is positioned in a gap between the leads. Accordingly, Applicants submit that Huang fails to disclose or suggest the mount part recited in claim 1.

Third, and further to the discussion above, Huang does not disclose a thermal connecting part "fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip," as required by claim 1. Applicants believe that Huang does not disclose a mount part at all, and so Huang also therefore does not disclose a thermal connecting part fastened into a mount part. However, to the extent that leads 302 are alleged to form the recited mount part – which Applicants do not concede – heat sink 310 is not fastened to leads 302 "to form an electrical connection" with leads 302. Instead, Huang states that the "heat sink 310 is bonded to the first surface 304a of the lead 302 by an adhesive, preferably an insulative bonding tape 320" (Huang, col. 4, lines 13-15). Thus, as stated explicitly by Huang, there is no electrical connection between heat sink 310 and leads 302. Accordingly, Applicants believe that Huang does not disclose or suggest a thermal connecting part "fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip," as required by claim 1.

Moreover, Applicants believe that a person of ordinary skill in the art would have found no reason to combine Huang and Okazaki as the Action suggests. Further still, Applicants submit that even if Huang and Okazaki were combined as proposed, the combination would not yield the subject matter of claim 1.

As discussed above, Huang discloses chip packages for semiconductor integrated circuit chips. Huang's chips, as best Applicants can determine, are not light-emitting chips, but are instead circuit chips that receive input electrical signals via certain leads 302, and transmit output electrical signals via other leads 302. In contrast, Okazaki's chip 30 is a light-emitting chip. The Action proposes to combine Okazaki with Huang "so as to increase reflection efficiency at the time of light emission" (Action at page 4). But this is irrelevant, because Huang's chip does not emit light. With no light emission from Huang's chip 324, there would have been no reason to include in Huang any structure intended to improve the efficiency of light emission. As Huang and Okazaki use fundamentally different types of chips, Applicants believe that there would therefore have been no reason to combine Huang and Okazaki as the Action suggests.

However, and for the sake of argument only, even if Huang and Okazaki were combined as the Action suggests, Applicants believe the combination still would not yield the subject matter of claim 1. As best Applicants can determine, like Huang, Okazaki does not disclose a mount part with "an opening formed therein and extending completely through the mount part." In addition, like Huang, Okazaki does not appear to disclose a thermal connecting part "fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip."

Further, Applicants respectfully disagree that Okazaki discloses a "reflector well surrounding said chip mounting area," as claim 1 requires. In Figure 2 of Okazaki, for example, a substrate 10 formed of resin includes a plated silver layer 20a that forms an electrical contact for chip 30, and covers a portion of a recess 11 formed in the substrate. Accordingly, while layer 20a is a reflective layer, recess 11 does not form a *reflector well* because a significant portion of recess 11 does not include reflectors.

In summary, Applicants believe that a person of ordinary skill in the art would have found no reason to combine Huang and Okazaki as the Action alleges. Notwithstanding the absence of such a reason, Applicants believe that even if Huang and Okazaki were combined, the combination still would neither disclose nor suggest all of elements of claim 1. Accordingly, Applicants submit that claim 1 is patentable over Huang and Okazaki, and respectfully request reconsideration and withdrawal of the rejection of claim 1 under 35 U.S.C. § 103(a).

Independent claim 52 covers leadframes for radiation-emitting components that include a first electrically conductive component having a mounting region with “an opening formed therein,” and a thermal connecting part “disposed in the opening of the mounting region and secured to the mounting region to form an electrical connection with the first electrically conductive component,” where the thermal connecting part includes “a reflector well surrounding said chip mounting area.” Applicants respectfully disagree that Huang and Okazaki, alone or in combination, disclose or suggest the leadframes recited by claim 52, for at least the following reasons.

As discussed above, Huang relates to chip packages for semiconductor integrated circuit chips, while Okazaki uses a light-emitting chip in his devices. Applicants therefore submit that the purported reason for combining these references – to increase light emission from Huang’s chip – is moot. Applicants believe instead that a person of ordinary skill in the art would have found no reason to combine Huang and Okazaki as the Action suggests.

For the sake of argument only, even if Huang and Okazaki were combined, the result still would not yield the subject matter of claim 52. As discussed above, neither Huang nor Okazaki discloses a first electrically conductive component “having an opening formed therein.” Instead, in Huang for example, each of the leads 302 is a separate element, and the space in which heat sink 310 is positioned is not an “opening” in an electrically conductive component, as claim 52 requires. Instead, the space is merely a gap adjacent to the ends of each of the leads 302. Leads 302 are all separate elements, none of which has “an opening formed therein.” Where claim 52 recites a single electrically conductive component having an opening, Huang discloses instead a

plurality of separate, disconnected leads, arranged so that chip 324 is positioned in a gap between the leads.

Further, as discussed above, neither Huang nor Okazaki discloses a thermal connecting part "secured to the mounting region to form an electrical connection with the first electrically conductive component," as required by claim 52. Instead, in Huang for example, to the extent that leads 302 are alleged to form the recited first electrically conductive component – which Applicants do not concede – heat sink 310 is not fastened to leads 302 "to form an electrical connection" with leads 302. Instead, Huang states that the "heat sink 310 is bonded to the first surface 304a of the lead 302 by an adhesive, preferably an insulative bonding tape 320" (Huang, col. 4, lines 13-15). Thus, as stated explicitly by Huang, there is no electrical connection between heat sink 310 and leads 302. Accordingly, Applicants believe that Huang does not disclose or suggest a thermal connecting part "secured to the mounting region to form an electrical connection with the first electrically conductive component," as required by claim 52.

Moreover, Applicants respectfully disagree that Okazaki discloses a "reflector well surrounding said chip mounting area," as claim 52 requires. As discussed above in connection with claim 1, Okazaki's substrate 10 formed of resin includes a plated silver layer 20a that forms an electrical contact for chip 30, and covers a portion of a recess 11 formed in the substrate. Thus, while layer 20a is a reflective layer, recess 11 does not form a *reflector well* because a significant portion of recess 11 does not include reflectors.

For all of the foregoing reasons, Applicants believe that a person of ordinary skill in the art would have found no reason to combine Huang and Okazaki, and even if such a combination occurred, the result still would not disclose the subject matter of claim 52. Accordingly, Applicants submit that claim 52 is patentable over Huang and Okazaki, and respectfully request reconsideration and withdrawal of the rejection of claim 1 under 35 U.S.C. § 103(a).

Claims 2-4, 6-12, 28, 30-31, 33-40, 43-46, 49, 52, 58, and 60-63 each depend from one of claims 1 and 52, and are therefore patentable over Huang and Okazaki for at least the same reasons as claims 1 and 52. Accordingly, Applicants also respectfully request reconsideration and withdrawal of the rejections of these claims under 35 U.S.C. § 103(a).

Claims 20-25 depend from claim 17, which is patentable over Huang as discussed above. Okazaki fails to cure the deficiencies of Huang regarding claim 17, at least because Okazaki does not disclose a mount part having “an opening formed therein and extending completely through the mount part,” and a thermal connecting part “fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip.” Moreover, as discussed above, Applicants believe a person of ordinary skill in the art would have found no reason to combine Huang and Okazaki, as these references relate to different types of semiconductor chips. Thus, Applicants submit that claim 17 is patentable over both Huang and Okazaki, alone or in any combination. For at least the same reasons, claims 20-25 are also patentable over both Huang and Okazaki, and Applicants therefore respectfully request reconsideration and withdrawal of the rejections of claims 20-25 under 35 U.S.C. § 103(a).

Claims 13-15 and 59 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Huang in view of Okazaki and further in view of Mamoru (JP 58-218153, “Mamoru”). The Action alleges that Huang discloses substantially all the elements of independent claim 13, but admits that Huang does not disclose an external electrical connecting strip having “a surface coating for improving component mounting characteristics” (Action at page 7). However, the Action alleges that Mamoru provides the missing disclosure, and that it would have been obvious to combine Huang and Okazaki with Mamoru “so as to obtain the external connecting strip with excellent adhesive strength” (Action at page 7). Applicants respectfully disagree, for at least the following reasons.

Independent claim 13 covers leadframes for radiation-emitting components that include a mount part having “an opening formed therein and extending completely through the mount part,” and a thermal connecting part “disposed in said opening and fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip.” As discussed above, Huang does not disclose or suggest such leadframes for multiple reasons.

First, Huang does not disclose the claimed “mount part.” In Huang, each of the leads 302 is a separate element. The space in which heat sink 310 is positioned is not an “opening” in an mount part, as claim 13 requires. Instead, the space is merely a gap adjacent to the ends of each

of the leads 302. Leads 302 are all separate elements, none of which has “an opening formed therein.” Where claim 13 recites a single mount part having an opening, Huang discloses instead a plurality of separate, disconnected leads, arranged so that chip 324 is positioned in a gap between the leads. Thus, Applicants believe that Huang does not disclose or suggest the mount part recited in claim 13.

Second, Huang does not disclose a thermal connecting part “fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip.” In Huang, to the extent that leads 302 are alleged to form the recited first electrically conductive component – which Applicants do not concede – heat sink 310 is not fastened to leads 302 “to form an electrical connection” with leads 302. To the contrary, Huang states that the “heat sink 310 is bonded to the first surface 304a of the lead 302 by an adhesive, preferably an insulative bonding tape 320” (Huang, col. 4, lines 13-15). Thus, there is no electrical connection between heat sink 310 and leads 302. Accordingly, Applicants believe that Huang does not disclose or suggest a thermal connecting part “fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip,” as required by claim 13.

Okazaki does not cure these deficiencies in Huang, because a person of ordinary skill in the art would have found no reason to combine Huang and Okazaki as explained above. Huang and Okazaki relate to different kinds of devices; Huang’s chips are semiconductor integrated circuit chips, while Okazaki’s chips are light emitting chips. As a result, the packaging and electrical contacting requirements in Huang and Okazaki are different. A person of ordinary skill in the art would therefore not have looked to Okazaki to provide any modifications of Huang’s chip packages.

Moreover, even if Huang and Okazaki were combined, the combination still would not yield the subject matter of claim 13, as explained above. Specifically, a purported combination of Huang and Okazaki still would not disclose or suggest a “mount part” and a “thermal connecting part” having the features recited in claim 13. Accordingly, Huang and Okazaki, alone or in combination, fail to disclose or suggest the subject matter of claim 13.

Without addressing or conceding the merits of the proposed combination of Huang, Okazaki, and Mamoru, which Applicants do not concede, and without addressing the elements of claim 13 that are allegedly taught by Mamoru, Applicants note that Mamoru also fails to cure the deficiencies of Huang with regard to claim 13. That is, Applicants believe Mamoru does not disclose or suggest a "mount part" and a "thermal connecting part" having the features recited in claim 13. Accordingly, the Action's proposed combination of Huang, Okazaki, and Mamoru still fails to disclose or suggest all of the features of claim 13. Applicants therefore submit that claim 13 is patentable over Huang, Okazaki, and Mamoru, alone or in any combination, and respectfully request reconsideration and withdrawal of the rejection of claim 13 under 35 U.S.C. § 103(a).

Claims 14-15 and 59 each depend from claim 13 and are patentable over Huang, Okazaki, and Mamoru for at least the same reasons. Applicants also therefore respectfully request reconsideration and withdrawal of the rejections of these claims under 35 U.S.C. § 103(a).

Claims 41-42 and 47-48 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Huang in view of Okazaki and further in view of Kumamoto et al. (U.S. Patent No. 6,129,993, "Kumamoto"). Without addressing or conceding the merits of the proposed combination of Huang, Okazaki, and Kumamoto, Applicants note that claims 41-42 and 47-48 each depend from claim 1. As explained above, claim 1 is patentable over Huang and Okazaki.

Kumamoto does not cure the deficiencies of Huang and Okazaki regarding claim 1, at least because Kumamoto does not disclose or suggest either a "mount part" or a "thermal connecting part" having the features recited in claim 1. Accordingly, Applicants believe that claim 1 is patentable over Huang, Okazaki, and Kumamoto, alone or in any combination.

For at least the same reasons, claims 41-42 and 47-48 are also patentable over Huang, Okazaki, and Kumamoto. Accordingly, Applicants respectfully request reconsideration and withdrawal of the rejections of claims 41-42 and 47-48 under 35 U.S.C. § 103(a).

Claim 64 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Huang alone (Action at page 4), or over Huang in view of Okazaki (Action at pages 5-6).

Specifically, the Action alleges that Huang or Huang in combination with Okazaki discloses all of the features of claim 64 except that “the radiation-permeable compound has a volume described by the formula $V \leq q H$, where H is a height of said chip and q is a scaling factor having a value less than 10 mm^2 ” (Action at pages 8-9). Applicants respectfully disagree, for at least the following reasons.

Independent claim 64, which has been amended in this reply to correct a typographical error, covers radiation-emitting components that include a leadframe having a mount part with “an opening formed therein and extending completely through the mount part,” and a thermal connecting part “fastened into said mount to form an electrical connection with the at least one external electrical connecting strip.” These limitations of claim 64 are similar to certain limitations of claims 1 and 17.

As explained above in connection with claims 1 and 17, Huang does not disclose a radiation-emitting component, because Huang’s chip 324 is not a light-emitting chip, but is instead a semiconductor integrated circuit chip. As such, Huang’s chip package is not a radiation-emitting component.

Also as discussed above in connection with claims 1 and 17, Huang does not disclose a “mount part” as recited in claim 64. Each of the leads 302 in Huang’s chip package is a separate element, and Huang’s heat sink 310 is positioned not in an “opening” in leads 302, but in a gap adjacent to the ends of each of the leads 302. Leads 302 are all separate elements, none of which has “an opening formed therein and extending completely through” the lead. Thus, Applicants submit that Huang fails to either disclose or suggest the mount part recited in claim 64.

Further to the discussion above of claims 1 and 17, Huang does not disclose a thermal connecting part “fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip,” as required by claim 64. Applicants believe that Huang does not disclose a mount part at all, and so Huang also does not disclose a thermal connecting part fastened into a mount part. However, to the extent that leads 302 are alleged to form the recited mount part – which Applicants do not concede – Huang’s heat sink 310 is not fastened to leads 302 “to form an electrical connection” with leads 302. Instead, Huang’s heat sink is

bonded to leads 302 using insulating bonding tape. Thus, there is no electrical connection in Huang's chip packages between heat sink 310 and leads 302, and Applicants therefore submit that Huang does not disclose or suggest a thermal connecting part "fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip," as required by claim 64.

Also as explained above in connection with claim 1, Applicants believe that a person of ordinary skill in the art would have found no reason to combine Huang and Okazaki. Applicants believe that Huang's chips are integrated circuit chips that process electrical signals. In contrast, Okazaki's chip 30 is a light-emitting chip. A person of ordinary skill in the art would have had no reason to combine Huang and Okazaki, as these references are drawn to chips that do not operate in the same manner, and perform significantly different functions. Nonetheless, even if Huang and Okazaki were combined (for the sake of argument only), Okazaki does not appear, as best Applicants can determine, to disclose either a mount part with "an opening formed therein and extending completely through the mount part," or a thermal connecting part "fastened into said mount part to form an electrical connection with the at least one external electrical connecting strip."

Accordingly, notwithstanding (and without conceding) the Action's allegation regarding the limitation in claim 64 that "the radiation-permeable compound has a volume described by the formula $V \leq q H$, where H is a height of said chip and q is a scaling factor having a value less than 10 mm^2 ," Applicants believe that the Action's proposed combination of Huang and Okazaki would not yield the subject matter of claim 64. Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 64 under 35 U.S.C. § 103(a).

In view of the foregoing, Applicants ask that the application be allowed.

Canceled claims, if any, have been canceled without prejudice or disclaimer. Any circumstance in which Applicants have: (a) addressed certain comments of the Examiner does not mean that Applicants concede other comments of the Examiner; (b) made arguments for the patentability of some claims does not mean that there are not other good reasons for patentability of those claims and other claims; or (c) amended or

canceled a claim does not mean that Applicants concede any of the Examiner's positions with respect to that claim or other claims.

The fee for the Petition for Extension of Time is being paid concurrently on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply any other charges or credits to Deposit Account 06-1050, referencing Attorney Docket No. 12406-0127001.

Respectfully submitted,

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